

ECF FILED ON:
JUL 07 2010

1 Michael W. Chen, Esquire
2 Nevada Bar No. 7307
3 THE COOPER CASTLE LAW FIRM
4 A Multi-Jurisdictional Law Firm
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6 Las Vegas, NV 89107
7 (702) 435-4175/(702) 435 4181 (facsimile)
8 Loan No. ***8690 / Our File No. 10-06-6903-NV

9 Attorney for Secured Creditor
10 Green Tree Servicing, LLC

11 UNITED STATES BANKRUPTCY COURT
12 DISTRICT OF NEVADA DIVISION

13 IN RE:
14 STEPHEN P ABELL ET AL
15 BETSY L ABELL
16 DEBTORS.

Case No.: 10-52001-GWZ
Chapter: 13
STIPULATION RE: TERMINATION
OF AUTOMATIC STAY

17 IT IS HEREBY STIPULATED BY AND BETWEEN Secured Creditor, Green Tree
18 Servicing, LLC, through its counsel, Michael W. Chen, Esq., THE COOPER CASTLE LAW
19 FIRM, and the Debtor, Stephen P Abell et al. and Betsy L Abell, who is represented by counsel,
20 Scott N Tisevich, Esq., and the Chapter 13 Trustee, William A Van Meter as follows:

- 21 1. That the Automatic Stay in the above-entitled Bankruptcy case is immediately terminated
22 and extinguished for all purposes as to Secured Creditor, Green Tree Servicing, LLC, its
23 assignees and/or successors in interest, may proceed with a foreclosure of and hold a Trustee's
24 Sale on the subject property, generally described as 7565 Los Lagos Ave, Sparks, NV 89436 *
25 ("Property" herein) and legally described as follows: *Rental - DEBTORS SURRENDERING*
LOT 271, IN BLOCK B OF CIMMARON UNIT TWO, ACCORDING TO THE MAP
THEREOF, FILED IN THE OFFICE OF THE COUNTY RECORDER OF WASHOE
COUNTY, STATE OF NEVADA, ON AUGUST 15, 1996, UNDER FILING NO. 2021240,
AND AS TRACT MAP NO. 3289, AND AMENDED BY CERTIFICATE OF

1 AMENDMENT FILED OCTOBER 30, 1996, UNDER FILING NO. 2043869, OF
2 OFFICIAL RECORDS
3

4 2. That the Chapter 13 Trustee agrees that there is no equity in the subject property, and has
5 agreed to abandon the same.

6 3. That after the sale of the subject property, any excess proceeds shall be turned over to the
7 Trustee for disbursement as these funds have liquidation value to the unsecured creditors of this
8 case.

9 4. That upon disposition of the collateral, Creditor may amend said proof of claim and share in
10 any distribution from the date of the filing of the amended claim pursuant to the confirmed Plan.

11 5. That the Trustee is not required to recover previous distributions from other creditors.
12 for distribution on Creditor's amended claim. This may result in a percentage of
13 payment to creditor's amended claim different than to other creditors.

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16 ///

1 6. That this Stipulated Order is binding against any conversion of the subject
2 Bankruptcy proceeding.

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4 SO STIPULATED

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6 Date: June 30, 2010

By: /s/ Michael W. Chen, Esq.
STEPHANIE L. COOPER, ESQ.
THE COOPER CASTLE LAW FIRM
A Multi-Jurisdictional Law Firm
Attorney for Secured Creditor
Green Tree Servicing, LLC

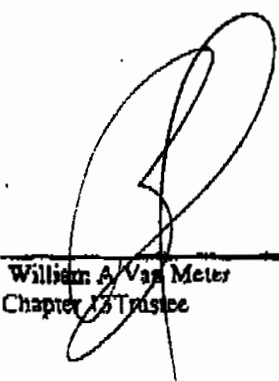
7
8
9 SO STIPULATED

10
11 Date: June 30, 2010

By: Scott N. Tisevich 7/6/10
Scott N Tisevich, Esq.
Attorney for Stephen P Abell et al. and Betsy L Abell

12
13
14 SO STIPULATED

15
16 Date: June 30, 2010

By: 
William A. Van Meter
Chapter 13 Trustee